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[REDACTED]  
[REDACTED]  
[REDACTED]

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure: in a discussion with Police Officer Kristen White during pre-trial hearing preparation, she indicated that during the time she has been employed by the New York City Police Department, she has been named as a defendant or co-defendant in federal civil lawsuits. However, because her involvement in the lawsuits was limited to only receiving notice of the claims from the Law Department of the City of New York, other than what is indicated below, Officer White had no knowledge about either the status of the lawsuits, or the specific allegations contained in the complaints. In this discussion, Officer White indicated that she had not been deposed in any civil lawsuit, nor had he given trial testimony in a civil lawsuit. I also note that Officer White has informed [REDACTED]

[REDACTED] She does not know any further details about any other matters.

As a result of my conversation with Det. White, in March 2017, the People performed an updated check of Officer White's lawsuits, and the following is a list of those lawsuits that People are aware of:

1. *Melissa Capasso v. City of New York*, 11CV4111(RMB) – settled in 2012 for \$11,000 with stipulation of settlement filed ending litigation in the Eastern District of New York;
2. *John Lauricella v. City of New York*, 12Civ.3015(NRB) – the action was dismissed with prejudice;
3. *Zeigler v. City of New York*, 14CV1139 (BMG) – the action was dismissed with prejudice;
4. *Kenneth Smith v. City of New York*, 14CV09069 – the action is still pending.